

**Educational Programs/A Better Way Than "Throw Away"**

Established 1983

**C.U.R.E.****Citizens Urge Rescue of the Environment**

P.O. Box 1146

Hanover, PA 17331

August 2, 2000

Ms. Kelley A. Chase  
Remedial Project Manager  
U.S. EPA (3HS21)  
1650 Arch Street  
Philadelphia, PA 19103-2029

Dear Ms. Chase:

It is apparent to us that the Superfund Proposed Plan to Amend the Operable Unit One Record of Decision, Keystone Landfill, Union Township, Adams County, Pennsylvania, could be partially based on the Golder Associates Focused Feasibility Study. For this reason, our comments have been broken down into the following two segments:

- I. Golder Associates Focused Feasibility Study.
- II. Superfund Program Proposed Plan

If you have any questions, please feel free to contact us at 630-8715 (Mary Minor) or 359-4605 (Dean Hilker).

Sincerely,



Mary Minor, President  
For C.U.R.E. Board of Directors



Dean Hilker, Vice President  
For C.U.R.E. Board of Directors

# I. COMMENTS ON THE GOLDER ASSOCIATES FOCUSED FEASIBILITY STUDY

*Presented by Mary Minor and Dean Hilker  
Citizens Urge Rescue of the Environment (C.U.R.E.)*

## Page 1:

- Soil vapor extraction (SVE) systems "*were not considered to be technically feasible.*" C.U.R.E. has, in fact, asked for such systems to be considered. C.U.R.E. was not taken seriously.
- "... *no waste characterization was available . . .*" C.U.R.E. has asked for "waste characterization" identification since 1984.
- The record should show that C.U.R.E. proposed (in the 1980's) that best available technologies (BAT's)/Innovative Technologies (IT's), such as SVE, be considered at Keystone. Comments of citizen groups regarding remedial action alternatives at superfund sites should be considered in a more timely way. Waiting to consider such BAT's and IT's is costly to everyone, as well as the environment.

## Page 2:

- What "*point of use treatment*" was written in the 1990 Record of Decision (ROD)? Please identify reference information.
- "... *through the installation of an additional diversion channel and a detention basin or similar measures to be evaluated during design.*" Please explain "similar measures." C.U.R.E. would like to review the draft SEC plan when available.

## Page 3:

- Public record should indicate: Keystone was permitted by Pennsylvania Department of Environmental Resources (PADER), but not until 1980.
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- Industrial waste and construction debris was landfilled by virtue of "permit modifications" and was not part of the original permit from PADER
- Please note that PADER records show that not all trenches had a certified renovating base. Also, PADER records show that the department technical staff said (beginning in 1970's) that the site would need a leachate collection and treatment system in order to protect the groundwater. Further, renovating layer and final cover material was ripped phyllite - not silty clay soil.
- Please explain the Conestoga Limestone Ridge.
- "... *residents near the Site typically utilize private wells.*" Note that some residents near the Site use spring water.

**Page 3: (Continued)**

- Is EPA confident that there are "*75 residences within one-mile of the Site.*" What is the basis for this statistic?
- "... *Mundorff Spring, which is located east of the Site.*" Please correct to read: Mundorff Spring, which was a residential water supply, is located east of the site.

**Page 4:**

- The record should show that the USEPA had listed Keystone on its "Open Dump Inventory" before the citizens' "complaints." Also, sampling results from community residents had confirmed the presence of VOC contaminants prior to the USEPA Field Investigation Team (FIT). Please insert this in the public record.
- Please note that the groundwater was also sprayed into a wooded area between landfill and nearby homes.
- "... *and the contents were disposed off-site.*" Where was "off-site" water disposed?
- "... *USEPA issued the OU-1 ROD on September 30, 1990.*" Please note that the OU-1 ROD was an Interim ROD.

**Page 5:**

- According to PADER records, the landfill is covered with ripped phyllite, which was not considered by PADER as an effective plan to protect groundwater
- Again, this "soil" was ripped phyllite. This is significant. This material is being relied upon as adequate cover material. The surface soil (as mapped by USDA) was primarily glen elg silt loam, with a range in permeability from 2.0" to 6.3" per hour in the first 24" of soil.

**ATTACHMENT A – Final ELGE Pilot Study Report**

**Page 18:**

- "... *and a waste depth of 30 feet.*..." According to EPA, this should read 40 feet deep.

## **II. COMMENTS ON SUPERFUND PROGRAM PROPOSED PLAN**

*Presented by Mary Minor and Dean Hilker  
Citizens Urge Rescue of the Environment (C.U.R.E.)*

### **Page 1:**

- What is required for normal closing of a landfill according to Pennsylvania Department of Environmental Protection (PADEP) regulations?

### **Page 3:**

- **SITE BACKGROUND:** See Golder Associates Focus Feasibility Study Comments - Page 3.

### **Page 4:**

- "*... EPA confirmed the presence of low levels of VOC contamination in some of the residential wells.*" Change to read: ... EPA confirmed the presence of low levels of VOC contamination in some of the residential water supplies.

### **Page 5:**

- "*... Amendment, carbon filtration units have been offered to residents within ¼ miles of the landfill.*" Change to read: ... the Amendment to offer carbon filtration units have been offered to residents within ¼ miles of the landfill and at least one family living one mile from the landfill (with the exception of Maryland residents).
- "*... and to evaluate VOC removal from the landfill*" Will you also evaluate the methane removal?
- "*Use of deed restrictions on the landfill property.*" Please explain deed restrictions, using Executive Summary form and any other information needed.
- "*Addition of low permeability cover soil to maintain a minimum 2-foot thick soil cover across the landfill*" Will present cover soils be delineated (by scientific tests) to determine existing permeability conditions before "addition of permeability cover soil"?

### **Page 6:**

- In paragraph one, please describe comprehensive investigation of the landfill cover thickness to be performed. Will this consist of a grid system or grab samples? Where will soil be obtained ... from the Site? Also, describe the soil type. Historically, the on-site "soil" was, in fact, phyllite.
- Describe the method of waste investigation. What quality soils are to be used (note: sewage sludge had to be used in the past)?

Page 6: (Continued)

- "... tree covered portion of the landfill will be removed via flush cutting or controlled application of herbicides..." Describe the types of herbicides to be used.

Page 7:

- "... use of supplemental fuel at the flare." What supplemental fuel? Be specific.

Page 8:

- "... and any available historical records..." Who produced these historical records?
- Under the heading "*Condensate Treatment*," would the records of the other fifteen operating sites in the United States (where such gas treatment systems are in use) be a source of information that would reveal any data regarding ambient air omissions of a nature that might harm people living nearby? Concerns exist for any possible effects to life around the site. What if estimated VOC emissions are erroneously reported, etc.?

Page 9:

- "*Upgrades to the Storm Water Management System*" A minimum of (quality) 2-ft. soil should be maintained from the lowest elevation of the detention basin and the rip-rap lined channel.
- "... *Proposed Plan recommends that the deed restrictions be limited to the landfill itself and not extend to other portions of the Site...*" Why not the entire property? How can deed restrictions reasonably cease at actual landfill boundaries?

Page 12:

- "*#3. Soil Cover*" Where will soil be obtained that meets the permeability of this  $2.2 \times 10^{-6}$  cm/sec (if this is correct)? How does glen elg soil meet the stated criteria?

Page 16:

- "*Community Acceptance*" Community acceptance could better be a realization if the local residents and nearby communities are kept informed of progress/lack of progress (or any potential problems or threats to the safety, health and welfare of citizens and environment of the area). A minimum of monthly written reports of progress and notification of any problems (as they arise) are expected. Information to be sent to PACE, Carroll County, Maryland, C.U.R.E., Union Township, PADEP, Adams County Commissioners, Hanover Borough, Littlestown Borough, local newspapers, radio and television in Maryland and Pennsylvania. The foregoing is a minimum list of those to be informed.

As the innovative Site Investigation proceeds, the community needs to be informed via the monthly reports and other notification, as necessary.

Page 22:

- We appreciate the extension of the public comment period to August 5, 2000. Thank you!